

SHER TREMONTE LLP

March 14, 2021

**VIA ECF**

The Honorable William H. Pauley, III  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Thomas Irigoyen***  
Case No. 19-CR-226 (WHP)

Dear Judge Pauley:

We write on behalf of our client, Thomas Irigoyen, to respectfully request that sentencing, currently scheduled for April 13, 2021, be adjourned for approximately 30 days. Mr. Irigoyen's health issues, in particular his obesity and heart condition, make him especially vulnerable to severe complications from COVID-19. However, Mr. Irigoyen anticipates receiving a vaccine in the near future and expects to be fully dosed by approximately the middle of next month. Moreover, as of several days ago the quarantine requirements that New York State had previously applied to inbound domestic travelers were lifted. Accordingly, we anticipate that Mr. Irigoyen should be able to travel to the Southern District of New York in the weeks following his vaccination. In light of these developments, we request a one-month adjournment of the current April 13 sentencing date, to afford Mr. Irigoyen time to deal with any side-effects of the vaccine and make final preparations for sentencing. We have spoken to Assistant U.S. Attorney Dan Wolf and he consents to the proposed adjournment. We appreciate the Court's consideration.

Application granted. Sentencing adjourned to  
May 27, 2021 at 11:00 a.m.

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.

Respectfully submitted,

/s/ \_\_\_\_\_  
Michael Tremonte  
Noam Biale

March 15, 2021